

Document Log Item

Addressing	
From	To
Carl Goldstein/R9/USEPA/US	"Kenneth Mcleod" <kmcleod@sampac.com> "Kenneth Mcleod" <kmcleod@sampac.com>
CC	BCC
jcox@cosintl.com pjp617@uow.edu.au	Mariela Lopez/R9/USEPA/US@EPA
Description Form Used: Memo	
Subject	Date/Time
COS TRI reporting of Ammonia purchases/release-calendar year 2005	05/09/2007 03:24 PM
# of Attachments	Total Bytes
0	13,943
NPM	Contributor
	Marcela VonVacano
Processing	
Comments	

Body

Document Body

Hi Ken,

I write because it appears that COS and EPA TRI staff are not having good communications, **and it is in COS best financial interest to provide the specific information that EPA is requesting, in a clear and unambiguous format, to make it easy for EPA to evaluate your status regarding ammonia releases to the environment from your facility.**

EPA already has your "release" information that you submitted on their form, so that is done and good. However, EPA also wants your "usage" figure, which is not on the EPA form and that is why they are asking for it now. They need this information now.

If a facility does not reach a EPA threshold level, then that facility will not be subject to a financial penalty for failure to submit their release report. EPA is now trying to determine if COS does exceed that threshold level, so I strongly advise that you provide the information as outlined below in Ms. Lopez's email:

Estimated amount of ammonia in your tanks in January 2005 + total amount of ammonia purchased in calendar year 2005 - estimated amount of ammonia in your tanks in December 2005 = USAGE

I also suggest that you cc me on your email back to Ms. Lopez.

Thanks. I appreciate your immediate attention to this matter.

-Carl

Carl L. Goldstein
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USEPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105
(415)972-3767; fax(415)947-3560
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----- Forwarded by Carl Goldstein/R9/USEPA/US on 05/09/2007 03:01 PM -----

Mariela Lopez/R9/USEPA/US

05/09/2007 06:49 AM

To "Kenneth Mcleod" <kmcleod@sampac.com>
cc "SAM Alfredo Pagan" <apagan@sampac.com>,
Carl Goldstein/R9/USEPA/US@EPA, "Jim Cox"
<jcox@cosintl.com>

Subject: RE: Ammonia purchases - calendar year 2005 📎

Hi Ken,

I have given you this formula before to get the official use number, if you could please use that and give me one number that you have multiplied out already.

Amount in Tanks in January 2005 + Purchases - End of Year Amount in Tanks (December 2005) = Usage.

Thanks,
Mariela

Mariela L. Lopez
Program & Enforcement Officer
Toxics Release Inventory Program
U.S. Environmental Protection Agency
75 Hawthorne Street, (CED-4)
San Francisco, CA 94105
Phone: (415) 972-3771
Fax: (415) 947-3583
"Kenneth Mcleod" <kmcleod@sampac.com>

"Kenneth Mcleod"
<kmcleod@sampac.com>

05/08/2007 06:19 PM

To: Carl Goldstein/R9/USEPA/US@EPA, Mariela Lopez/R9/
USEPA/US@EPA
cc: "Jim Cox" <jcox@cosintl.com>, "SAM Alfredo Pagan"
<apagan@sampac.com>
Subject: RE: Ammonia purchases - calendar year 2005

Good afternoon all.

I have had some difficulties getting the information due to internal issues. However, our Controller has pulled the file from the company where the NH3 is purchased, and we are pleased to advise that our purchases for the year of 2005 amounted to two tanks each of 1730 lbs.

I will resend a copy of my fax with a (correct) copy of the PO inquiry, so as to ensure an audit trail for this information.

regards

Kenneth

=====

Kenneth McLeod

COS Samoa Packing Ltd

Hi Ken,

I just want to make sure that you need provide the information requested by Mariela for the year 2005 (the faxed screen dump was for 2006, she does not want a screen dump).

-Carl

----- Forwarded by Carl Goldstein/R9/USEPA/US on 05/08/2007 10:22 AM

Mariela
Lopez/R9/USEPA/U
S To
"Kenneth Mcleod"
05/08/2007 10:08 <kmcleod@sampac.com>
AM cc
Jim Cox <jcox@cosintl.com>, Carl
Goldstein
Subject
Re: Ammonia purchases - calendar
year 2005(Document link: Carl
Goldstein)

Hi Ken,

I know you are super busy, but I need that information I requested from you. Essentially, I need one number for 2005 that you used to determine that COS needed to report to the EPA. This would mean, if you are otherwise using the ammonia, (which I believe you are, since you are not manufacturing ammonia at the facility, or incorporating ammonia into the fish), then the threshold is 10,000 pounds per year, per chemical. This means that your facility would have "used" 10,000 pounds or more of ammonia in those tanks in order to have to report to us. I need that "use" number.

For example, the screen dump you faxed to me shows only 3,460 pounds of Ammonia ordered in 2006. If this is an accurate representation of the amount of ammonia in the facility per year, then you would not have met the 10,000 pound threshold for 2006.

Please get this to me as soon as possible. If you have any questions please feel free to call or e-mail.

Thanks!

Mariela L. Lopez

Program & Enforcement Officer

Toxics Release Inventory Program

U.S. Environmental Protection Agency

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